

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CELESTE J. MATTINA, Regional Director, Region 2,  
National Labor Relations Board, for and on behalf of the  
NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

KINGSBRIDGE HEIGHTS REHABILITATION  
AND CARE CENTER,

Respondent.

**DECLARATION OF IRENA  
VOLINSKY**

**Civil Action No:  
08-CV-6550 (DLC)  
ECF CASE**

I, IRENA VOLINSKY, hereby declare, under penalty of perjury, pursuant to 28 U.S.C. §1746:

1. I am the Recreation Director for Respondent, Kingsbridge Heights Rehabilitation and Care Center ("Kingsbridge") at its Bronx, New York facility. I have been employed at Kingsbridge in this capacity for nine years. I am familiar with the facts and circumstances surrounding this action and submit this Declaration in Opposition to Petitioner's Petition for Temporary Injunction under Section 10 (j) of the National Labor Relations Act.

2. Since March, 2008 I have been subjected to intense harassment by striking members of 1199 SEIU.

3. On March 14, 2008 I was walking past the union bus when a union organizer named Claire opened the window and began spewing profanities at me. She then spit at me from the bus window.

4. Then, on August 31, 2008 I was walking toward the Kingsbridge facility when Claire saw me from behind the police barrier. She began screaming profanities at me, calling me a "bitch" and other obscene names.

EXECUTED ON THE 5 DAY OF AUGUST, 2008.

  
IRENA VOLINSKY